

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

FREEDOM FROM RELIGION FOUNDATION, INC.,
DAN BARKER AND ANNIE LAURIE GAYLOR,
CO-PRESIDENTS OF FFRF,

Plaintiff,

v.

Case No. 17-CV-330

DONALD TRUMP, PRESIDENT
OF THE UNITED STATES; and
JOHN KOSKINEN, COMMISSIONER
OF THE INTERNAL REVENUE SERVICE,

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR PLAINTIFFS TO
RESPOND TO DEFENDANTS' MOTION TO DISMISS FOR LACK OF SUBJECT
MATTER JURISDICTION OR FOR FAILURE TO STATE A CLAIM**

The Plaintiffs respectfully request that the Court extend by seven days the time for Plaintiffs to respond to Defendants' Motion To Dismiss For Lack Of Subject Matter Jurisdiction Or For Failure To State A Claim and in support thereof submit the following:

1. The Defendants filed a Motion To Dismiss For Lack Of Subject Matter Jurisdiction Or For Failure To State A Claim on August 22, 2017.
2. The Plaintiffs' response to the Motion is due on September 12, 2017.
3. Since August 22, 2017, counsel for the Plaintiffs has been extensively involved in a mediation in Case No. 3:16-cv-00323.
4. Counsel for the Plaintiffs has also been extensively involved in briefing for the same case, including final pre-trial disclosures. The responses to the final pre-trial disclosures are to be filed in the Western District on September 8, 2017, and are occupying more of counsel's time than anticipated.

5. Due to extensive briefing, as well as other matters on counsel's docket, this request is made for an additional seven days to respond to the pending motion in this matter.

6. Counsel for Plaintiffs has discussed this request with counsel for the Defendants, who does not object.

7. Plaintiffs accordingly request that the responses to the pending motion be extended from September 12, 2017 to September 19, 2017.

8. This motion for extension will not otherwise affect any pending scheduled activities in this matter, which has not been set for trial.

9. For good cause shown, Plaintiffs' request that the Court extend the time allowed for the Plaintiffs to respond to the pending motion to September 19, 2017.

Dated this 6th day of September, 2017.

BOARDMAN & CLARK LLP

By

/s/ Richard L. Bolton

Richard L. Bolton

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CERTIFICATE OF SERVICE

I certify that, on September 6, 2017, service of the foregoing was made upon all parties by filing it with the Clerk of Court using the CM/ECF system.

/s/ Richard L. Bolton

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